

**REMARKS**

The Office Action of December 28, 2004, has been reviewed, and in view of the following remarks, reconsideration and allowance of all of the claims pending in the application are respectfully requested.

**Evidence of Prior Invention Overcomes the Rejections**

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent Publication No. 20020087516 to Cras in view of U.S. Patent No. 6,473,750 to Petculescu.

The priority date of the Cras reference is April 3, 2001. The Declaration of prior invention, filed herewith, establishes prior invention in 1999, coupled with diligence to an actual reduction to practice in June of 2000 and a constructive reduction to practice in June 20, 2001.

As a result, the Cras reference is not prior art under any provision of section 102 and thus may not be used in a rejection under 103 as proposed. Withdraw of any rejections based on Cras is respectfully requested.

**CONCLUSION**

In view of the foregoing amendments and arguments, it is respectfully submitted that this application is now in condition for allowance. If the Examiner believes that prosecution and allowance of the application will be expedited through an interview, whether personal or telephonic, the Examiner is invited to telephone the undersigned with any suggestions leading to the favorable disposition of the application.


It is believed that no additional fees are due for filing this Response. However, the Director is hereby authorized to treat any current or future reply, requiring a petition for an extension of time for its timely submission as incorporating a petition for extension of time for the appropriate length of time. Applicants also authorize the Director to charge all required fees, fees under 37 C.F.R. §1.17, or all required extension of time fees, to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS LLP

Date: June 22, 2005

By: \_\_\_\_\_

  
Brian M. Buroker  
Registration No. 39,125

Hunton & Williams LLP  
1900 K Street, N.W., Suite 1200  
Washington, D.C. 20006-1109  
(202) 955-1500  
(202) 778-2201 (fax)